

RECEIVED
FEDERAL ELECTION
COMMISSION

2009 NOV 20 AM 10:45

OFFICE OF GENERAL
COUNSEL

RECEIVED
ELECTRAL CENTER
2009 NOV 20 AM 7:54

Robert B. Ostrom
Attorney at Law
2106 Eden Wood Lane
Gambrills, Maryland 21054
301 888-0111
301 648-4962 (Cell)
410 451-4625 (Fax)
rbolaw@aol.com

November 16, 2009

Kim Collins
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR:6223

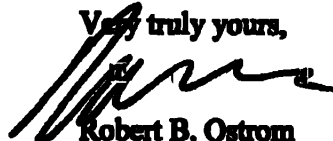
Dear Kim,

In response to your email, enclosed are the originals of the documents I faxed to you on November 12, 2009 on behalf of the Maryland Republican State Central Committee. I understand that the filing date of our response was November 13, 2009. The documents enclosed include the originals of the following items:

Statement of Designation of Counsel
Reply of Maryland Republican State Central Committee
Affidavit of Robert Christopher Rosenthal (Exhibit A)

Again, thank you for your assistance in this matter.

Very truly yours,



Robert B. Ostrom
Counsel
Maryland Republican State
Central Committee

11044302853

**Robert B. Ostrom
Attorney at Law
2106 Eden Wood Lane
Gambrills, Maryland 21054
301 888-0111
301 648-4962 (Cell)
410 451-4625 (Fax)
rbolaw@aol.com**

November 12, 2009

**Jeff S. Jordan
Supervisory Attorney
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463**

RE: MUR:6223

Dear Mr. Jordan,

Pursuant to your letter of October 26, 2009 which was received by my client, Maryland Republican State Central Committee, on October 28, 2009, please find enclosed the following documents:

**Statement of Designation of Counsel
Reply of Maryland Republican State Central Committee
Affidavit of Robert Christopher Rosenthal (Exhibit A)**

Please contact me if anything further is needed. Thank you.

Very truly yours,



**Robert B. Ostrom
Counsel
Maryland Republican State
Central Committee**

Cc: Kim Collins

11044302854



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Client
FAX (202) 278-3023

MUR # 6223

NAME OF COUNSEL: ROBERT B. OSTROM

FIRM: GENERAL COUNSEL, MARYLAND REPUBLICAN STATE CENTRAL COMMITTEE

ADDRESS: 2106 EDEX WOOD LANE

GAMBRILLS, MARYLAND 21054

TELEPHONE- OFFICE (301) 858-0111

FAX (410) 451-4625
email rbo@ow@aol.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/12
Date

Robert C. Rosenthal
Respondent/Client Signature

Treasurer
Title

RESPONDENT/CLIENT ROBERT CHRISTOPHER ROSENTHAL,
(Please Print) TREASURER
MARYLAND REPUBLICAN STATE CENTRAL COMMITTEE

MAILING ADDRESS: 15 WEST STREET

ANNEAPOLIS, MD 21401

TELEPHONE- HOME () _____

BUSINESS (410) 263-2125

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(1)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

Rev. 2006

11044302855

11044302856

FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION

2009 NOV 20 AM 10:45

In the matter of: Edward St. John, et al

OFFICE OF GENERAL
COUNSEL

MUR: 6223

**REPLY OF THE MARYLAND REPUBLICAN
STATE CENTRAL COMMITTEE TO COMPLAINT**

The Maryland Republican State Central Committee ("MDGOP") by its attorney, Robert B. Ostrom, responds to the Complaint filed in this matter by Citizens for Responsibility and Ethics in Washington ("CREW") and states as follows:

1. MDGOP is the state committee of the Maryland Republican Party, is responsible for reporting campaign contributions pursuant to Maryland state and federal law and files timely reports of its financial activities as required by law. *Rosenthal Affidavit, Exhibit A.*

2. MDGOP complies with federal and state requirements regarding the handling of contributions including accepting contributions which are proper under the law and rejecting contributions which MDGOP believes are inconsistent with the law. MDGOP does not accept contributions which it has any reason to believe are illegal under state and federal campaign finance laws and takes all prudent and reasonable steps to determine if any contributions given should be rejected pursuant to the requirements of state and federal campaign finance laws. *Rosenthal Affidavit, Exhibit A.*

3. During all times relevant in the Complaint, Robert Christopher Rosenthal ("Treasurer") has served as the treasurer of MDGOP having commenced his position in April 2006. In this capacity, Treasurer has overall authority and responsibility under state

and federal campaign finance laws on behalf of MDGOP including the filing of all required federal and state campaign finance reports. *Rosenthal Affidavit, Exhibit A*

4. The allegations in Complaint paragraphs 2 through 6 and 8 through 9 do not apply to MDGOP and MDGOP has no response to such allegations.

5. MDGOP did receive the contributions listed in paragraph 10 of the Complaint, that is, \$10,000 personal contributions from each of the six individual donors: Lawrence Maykrantz, Robert Becker, Jeffrey Gith, Stanley Meros, H. Richard Williamson and Gerard Wit (the "Contributions"). MDGOP did not have any knowledge or information regarding the circumstances of the Contributions, as alleged in paragraph 10 of the Complaint, until receiving the Complaint. *Rosenthal Affidavit, Exhibit A.*

6. At no time relevant in the Complaint was MDGOP ever aware of any alleged irregularity or illegality of the Contributions. The Contributions were each made by the personal check of the six donors. The Contributions were all within the contribution limits for each of the individual contributors. MDGOP had no knowledge, and had no reason to believe, that the Contributions may have been illegal. Each of the donors provided the information required by law to MDGOP, including address, name of employer and occupation. Each of the Contributions was handled in the regular and ordinary course of the business of the MDGOP and properly handled as a legal individual contribution to MDGOP. There was no reason for MDGOP or Treasurer to question the legality of the Contributions. *Rosenthal Affidavit, Exhibit A.*

7. MDGOP fully complied with the requirements of 11 CFR 103.3. The Contributions presented no "genuine questions as to whether they were made by [a]

corporation..." as provided in 11 CFR 103.3(b)(1). There was no evidence of illegality or any reason for MDGOP to suspect any illegality. *Rosenthal Affidavit, Exhibit A.*

8. As required by law, MDGOP reported the Contributions on the appropriate report or reports filed with the FEC. (See Complainants' Exhibit C). Until this Complaint was provided to MDGOP and Treasurer in October 2009, MDGOP and Treasurer had no knowledge of any allegation of irregularity or illegality of the Contributions. *Rosenthal Affidavit, Exhibit A.*

9. MDGOP had no knowledge, and had no reason to know, of any reimbursement of the Contributions as alleged in Count I of the Complaint. *Rosenthal Affidavit, Exhibit A.*

10. MDGOP had no knowledge, and had no reason to know, of any use of corporate funds as alleged in Count II of the Complaint. *Rosenthal Affidavit, Exhibit A.*

11. MDGOP has no knowledge of any of the allegations in paragraph 11 of the Complaint and denies any allegations in paragraph 11 to the extent that they apply to MDGOP.

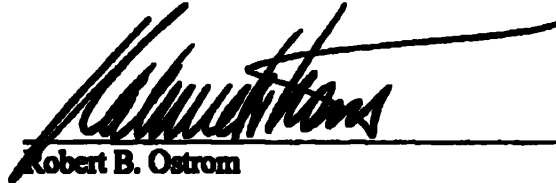
12. After the filing of the Complaint, MDGOP then became aware of the history of the Contributions and learned that in 2007 each of the six individual donors, as listed in paragraph 5 above, reimbursed to their employer, St. John Properties, Inc., that portion of the bonus paid to them in 2007 which equaled the Contributions that each of the six donors had made to MDGOP in 2006.

13. The Contributions were legally received by MDGOP as proper individual campaign contributions and there was no violation of any law or regulation by MDGOP regarding the Contributions.

11044302858

CONCLUSION

Having demonstrated by its reply to the Complaint that MDGOP has complied with all applicable law, MDGOP requests that the matter be dismissed as to MDGOP.



**Robert B. Ostrom
General Counsel
Maryland Republican State
Central Committee
2106 Eden Wood Lane
Gambrills, Maryland 21054
301 858-0111
410 451-4625 (fax)
rbolaw@aol.com**

11044302859